

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
: :
Wanda I Moreno : No. 18-15741-AMC
Debtor : :

ANSWER TO MOTION OF KIA MOTORS FINANCE
FOR RELIEF FROM THE AUTOMATIC STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted payments were missed and debtor asks for the chance to get catch up.
7. Admitted payments were missed and debtor asks for the chance to get catch up.

WHEREFORE Debtors respectfully request this Honorable Court deny Movant's Motion for Relief.

/s/ David M. Offen
David M. Offen
Attorney for Debtor(s)

Dated: 1/17/20

CERTIFICATE OF SERVICE

The following has been served by electronic mail:

William Craig on behalf of Kia Motors Finance
ecfmail@mortoncraig.com

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 1/17/20